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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 17, 1998

Magalie Roman Salas, Esq., Secretary
Federal Communications Commission
1919 M Street, NW Room 200
Washington, DC 20554

RE: *Clarification of the Commission's Rules on Interconnection Between LECs and Paging Carriers, CCB/CPD No. 97-24 ("SWBT clarification request")*

Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, First Report & Order, CC Docket Nos. 96-98, 95-185 ("interconnection reconsideration order")

Formal Complaints of AirTouch Paging against GTE, File Nos. E-98-08, E-98-10

Formal Complaint of Metrocall against Various LECs, File Nos. E-98-14-18

Dear Ms. Salas:

On July 17, 1998, the attached document, *The Interconnection of One-Way Messaging Networks and the Public Switched Telephone Network*, was delivered to the FCC staff indicated on the attached listing.

Pursuant to §1.1206(b) of the Commission's rules, two copies of this document and the associated personalized cover letters for each referenced docket (a total of eight sets) are hereby filed with the Secretary's office. Kindly refer questions in connection with this matter to me at 703-739-0300.

Respectfully submitted,

Angela E. Giancarlo, Esq.
Government Relations Manager

No. of Copies rec'd 0+8
List ABCDE

Enclosures

Magalie Roman Salas, Esq.

July 17, 1998

Page Two

Distribution List:

The Interconnection of One-Way Messaging Networks and the Public Switched Telephone Network

Rosalind Allen

Kathryn Brown

Jim Casserly

Kyle Dixon

Ari Fitzgerald

Karen Gulick

Jane Jackson

Edward Krachmer

Paul Misener

Dan Phythyon

Tamara Preiss

Jeanine Poltronieri

Jim Schlicting

Katherine Schroder

Lisa Sockett

Peter Tenhula

Suzanne Tetreault



VIA HAND DELIVERY

July 17, 1998

Ms. Rosalind K. Allen
Federal Communications Commission
Wireless Telecommunications Bureau
2025 M Street, N.W.
Washington, D.C. 20554

RE: *Clarification of the Commission's Rules on Interconnection Between LEC's and Paging Carriers, CCB/CPD No. 97-24 ("SWBT clarification request")*

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Formal Complaint of Metrocall against Various LEC's, File Nos. E-98-14-18

Dear Ms. Allen: *ROZ*

I have enclosed a newly published PCIA reference guide entitled *The Interconnection of One-Way Messaging Networks and the Public Switched Telephone Network*. I am hopeful that you will find this book useful - and that it will be a handy guide to which you will refer frequently.

Be assured that, pursuant to § 1.1206(b) of the Commission's rules, I have placed this document, the associated distribution listing, and copies of this letter on the record with Secretary Salas' office for each of the above-referenced dockets.

I will appreciate hearing from you as I am interested in your comments and feedback. Feel free to contact me at 703-739-0300, extension 3027.

Sincerely yours,

Angela E. Giancarlo, Esq.
Government Relations

Enclosure

• 500 Montgomery Street • Suite 700 • Alexandria, VA 22314-1561 •
• Tel: 703-739-0300 • Fax: 703-836-1608 • Web Address: <http://www.pcia.com> •



VIA HAND DELIVERY

July 17, 1998

Ms. Kathryn Brown
Federal Communications Commission
Common Carrier Bureau
1919 M Street, N.W.
Washington, D.C. 20554

RE: *Clarification of the Commission's Rules on Interconnection Between LEC's and Paging Carriers*, CCB/CPD No. 97-24 ("SWBT clarification request")

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Dear Ms. Brown:

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VIA HAND DELIVERY

July 17, 1998

Mr. James L. Casserly
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RE: *Clarification of the Commission's Rules on Interconnection Between LEC's and Paging Carriers, CCB/CPD No. 97-24 ("SWBT clarification request")*

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Dear Mr. Casserly:

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Angela E. Giancarlo, Esq.
Government Relations

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VIA HAND DELIVERY

July 17, 1998

Mr. Kyle D. Dixon
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RE: *Clarification of the Commission's Rules on Interconnection Between LEC's and Paging Carriers*, CCB/CPD No. 97-24 ("SWBT clarification request")

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Angela E. Giancarlo, Esq.
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July 17, 1998

Mr. Ari Fitzgerald
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RE: *Clarification of the Commission's Rules on Interconnection Between LEC's and Paging Carriers*, CCB/CPD No. 97-24 ("SWBT clarification request")

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Dear Mr. ^{Ari}Fitzgerald:

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Angela E. Giancarlo, Esq.
Government Relations

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July 17, 1998

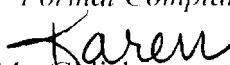
Ms. Karen Gulick
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RE: *Clarification of the Commission's Rules on Interconnection Between LEC's and Paging Carriers, CCB/CPD No. 97-24 ("SWBT clarification request")*

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Dear Ms. Gulick:

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Angela E. Giancarlo, Esq.
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July 17, 1998

Ms. Jane E. Jackson
Federal Communications Commission
Common Carrier Bureau
1919 M Street, N.W.
Washington, D.C. 20554

RE: *Clarification of the Commission's Rules on Interconnection Between LEC's and Paging Carriers*, CCB/CPD No. 97-24 ("SWBT clarification request")

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Dear Ms. Jackson:

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Sincerely yours,

A handwritten signature in cursive script that reads "Angela E. Giancarlo".

Angela E. Giancarlo, Esq.
Government Relations

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Mr. Edward B. Krachmer
Federal Communications Commission
Common Carrier Bureau
1919 M Street, N.W.
Washington, D.C. 20554

RE: *Clarification of the Commission's Rules on Interconnection Between LEC's and Paging Carriers, CCB/CPD No. 97-24 ("SWBT clarification request")*

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Dear Mr. ^{Ed}Krachmer:

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Angela E. Giancarlo, Esq.
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VIA HAND DELIVERY

July 17, 1998

Mr. Paul Miscner
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RE: *Clarification of the Commission's Rules on Interconnection Between LEC's and Paging Carriers, CCB/CPD No. 97-24 ("SWBT clarification request")*

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Formal Complaint of Metrocall against Various LEC's, File Nos. E-98-14-18

Dear Mr. Miscner:

A handwritten signature in cursive script that reads "Paul".

I have enclosed a newly published PCIA reference guide entitled *The Interconnection of One-Way Messaging Networks and the Public Switched Telephone Network*. I am hopeful that you will find this book useful - and that it will be a handy guide to which you will refer frequently.

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Sincerely yours,

A handwritten signature in cursive script that reads "Angela".

Angela E. Giancarlo, Esq.
Government Relations

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July 17, 1998

Mr. Dan Phythyon
Federal Communications Commission
Wireless Telecommunications Bureau
2025 M Street, N.W.
Washington, D.C. 20554

RE: *Clarification of the Commission's Rules on Interconnection Between LEC's and Paging Carriers, CCB/CPD No. 97-24 ("SWBT clarification request")*

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Dear Mr. ^{Dan}Phythyon:

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Sincerely yours,

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Angela E. Giancarlo, Esq.
Government Relations

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July 17, 1998

Ms. Tamara Preiss
Federal Communications Commission
Common Carrier Bureau
1919 M Street, N.W.
Washington, D.C. 20554

RE: *Clarification of the Commission's Rules on Interconnection Between LEC's and Paging Carriers, CCB/CPD No. 97-24 ("SWBT clarification request")*

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Dear Ms. *Tamara* Preiss:

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Sincerely yours,

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Angela E. Giancarlo, Esq.
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July 17, 1998

Ms. Jeanine Poltronieri
Federal Communications Commission
Wireless Telecommunications Bureau
2025 M Street, N.W.
Washington, D.C. 20554

RE: *Clarification of the Commission's Rules on Interconnection Between LEC's and Paging Carriers*, CCB/CPD No. 97-24 ("SWBT clarification request")

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Jeanine
Dear Ms. Poltronieri:

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Angela E. Giancarlo
Angela E. Giancarlo, Esq.
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July 17, 1998

Mr. Jim D. Schlichting
Federal Communications Commission
Common Carrier Bureau
1919 M Street, N.W.
Washington, D.C. 20554

RE: *Clarification of the Commission's Rules on Interconnection Between LEC's and Paging Carriers, CCB/CPD No. 97-24 ("SWBT clarification request")*

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July 17, 1998

Ms. Katherine Schroder
Federal Communications Commission
Common Carrier Bureau
1919 M Street, N.W.
Washington, D.C. 20554

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July 17, 1998

Ms. Lisa Sockett
Federal Communications Commission
Common Carrier Bureau
1919 M Street, N.W.
Washington, D.C. 20554

RE: *Clarification of the Commission's Rules on Interconnection Between LEC's and Paging Carriers*, CCB/CPD No. 97-24 ("SWBT clarification request")

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Angela E. Giancarlo, Esq.
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July 17, 1998


Mr. Peter A. Tenhula
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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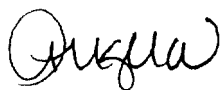

Dear Mr. Tenhula:

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Sincerely yours,



Angela E. Giancarlo, Esq.
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July 17, 1998

Ms. Suzanne Tetreault
Federal Communications Commission
Office of General Counsel
1919 M Street, N.W.
Washington, D.C. 20554

RE: *Clarification of the Commission's Rules on Interconnection Between LEC's and Paging Carriers*, CCB/CPD No. 97-24 ("SWBT clarification request")

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Suzanne
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The Personal Communications Industry Association

THE INTERCONNECTION OF ONE-WAY
MESSAGING NETWORKS AND THE PUBLIC
SWITCHED TELEPHONE NETWORK

ANSWERS TO COMMON QUESTIONS

First Edition
July 1998

TABLE OF CONTENTS

Introduction: The Personal Communications Industry Association	i
Executive Summary	ii
I. Definitions	1
II. Basic Entitlements of Paging Carriers	3
III. Preemptive Authority of the FCC Over Interconnection	7
IV. The FCC Rules Governing LEC/CMRS Interconnection	8
V. Paging As Local Service	10
VI. LEC Responsibility for Facilities	11
VII. Reciprocal Compensation	15
VIII. Point of Interface Between the LEC and Paging Networks	18
IX. Competitive Neutrality Between One-Way and Two-Way Service Providers	21
X. Types of Interconnection Arrangements	22
XI. Dedicated Transport Facilities Between Serving Areas	25
XII. Future Regulatory Rulings	27
Index	29

Introduction:
The Personal Communications Industry Association

The Personal Communications Industry Association ("PCIA") has more than 1,500 members worldwide and represents the chief providers of wireless voice and data communications. As the leading international trade association for the personal communications industry, PCIA's member companies include paging and messaging, broadband PCS, ESMR, SMR, and mobile data service providers as well as site owners and managers, manufacturers, distributors, technicians, and others providing services and products to the wireless industry.

PCIA's activities are based on an advocacy platform designed to highlight the fundamental public policy goals necessary for the continued growth of wireless technologies -- one of the most productive and competitive segments of our nation's economy. PCIA's advocacy platform, *The Agenda for a Wireless America*, is based on a simple but critical policy goal: achievement of a regulatory environment that fosters a competitive wireless industry by promoting market entry and growth. The tenets of the *Agenda* are:

1. Fair Interconnection
2. Wireless Tax Relief
3. Infrastructure Development
4. Network Coordination
5. Long-Term Spectrum Planning
6. Fostering International Opportunities

The following materials have been prepared by PCIA as part of its continuing effort to lead the charge to forge the regulatory changes necessary to ensure that wireless communications will be a viable alternative to local phone service.

Executive Summary

The Commission has under review a series of petitions for reconsideration, applications for review, requests for clarification and motions for a stay of the rules and rulings governing LEC/paging interconnection arrangements. In an effort to assist decision makers in synthesizing the paging industry's position from the ever-growing record of the proceedings, PCIA has prepared the material which follows.

Common questions relating to LEC/paging interconnection are posed and answered. To assist the reader, the questions and answers are organized under broad headings. An extensive index also is provided for ease of reference.

Viewed as a whole, the document establishes a number of fundamental principles that serve to frame the paging industry position. Among the most salient points:

- Paging service providers are telecommunications carriers with substantial obligations under the Communications Act and they are legally entitled to the same statutory rights and protections enjoyed by other telecommunications carriers which provide Commercial Mobile Radio Service ("CMRS").
- Among other rights, paging carriers are entitled to reasonable, non-discriminatory interconnection arrangements with LECs so that paging carriers can compete on a level playing field with other CMRS providers.
- Paging carriers have powerful competitive incentives to establish efficient, cost-effective interconnection arrangements under the current Commission rulings.
- The Commission was correct in ruling that LECs are not entitled to charge paging carriers for the portion of the interconnecting facility used to deliver LEC-originated traffic to paging carriers for local termination. This ruling clearly was given immediate effect by the Commission, which was well within its authority under Section 332 of the Communications Act. Inconsistent state tariff provisions must be deemed preempted.
- Paging carriers are entitled to compensation for communications terminated locally over their paging networks. The claim by some LECs that one-way services don't qualify for reciprocal compensation is completely without merit.

- The interconnection rights of paging carriers derive from multiple statutory provisions, not just from Sections 251 and 252 of the Communications Act. The claim by some LECs that paging carriers can only exercise or enjoy their interconnection rights by proceeding with negotiations under Sections 251/252 is wrong as a matter of law.
- The ruling that paging carriers are entitled to terminating compensation has survived a court challenge and has been endorsed by multiple state public utility commissions. Revising the ruling now would create disruption and risk reversal on appeal.
- The actions the Commission has taken to protect and promote paging interconnection rights are well within the Agency's authority under multiple provisions of the Communications Act. The Commission can and should further exercise its lawful authority by establishing a federal forum for setting terminating compensation rates to be paid to CMRS providers if voluntary negotiations fail.

I. Definitions

1. What does the phrase “one-way messaging” encompass?

As used here, “one-way messaging” encompasses tone-only, tone-plus-voice, numeric and alpha-numeric paging in which the end-to-end communication travels in one direction from the initiator of the paging message to the paging unit. The phrase does not refer to talk-back paging, response-paging, two-way paging and other interactive two-way messaging services.

In this series of questions and answers, the terms “paging service provider” and “paging carrier” refer to a provider of one-way messaging services.

2. Are paging service providers “telecommunications carriers” under the Communications Act of 1934, as amended?¹

Yes. The Communications Act defines a telecommunications carrier as one which provides, for a fee, a service to the public (or a substantial portion of the public) by which information of the user’s choosing is transmitted between or among points.² The Federal Communications Commission (the “FCC” or “Commission”) has determined correctly that paging service providers meet this definition.³

3. Does the fact that paging carriers are classified as “telecommunications carriers” under the Communications Act give rise to any obligations and/or benefits?

Yes. Paging carriers are obligated, among other things, to pay into the Universal Service Fund, to abide by restrictions regarding the use of Customer Proprietary Network Information (“CPNI”) and to interconnect directly or indirectly with other requesting telecommunications carriers. Having assumed these responsibilities under the Communications Act, paging companies are legally entitled to receive the

¹47 U.S.C. §§ 151 et seq. (1998) (the “Communications Act”).

²47 U.S.C. §§ 3(44) (defining “telecommunications carrier”) and 3(46) (defining “telecommunications service”).

³Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, First Report and Order, 11 FCC Rcd. 15,499 (1996) (Local Competition First Report).